quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO. (212) 849-7140

WRITER'S EMAIL ADDRESS marcgreenwald@quinnemanuel.com

August 21, 2020

VIA ECF

Honorable Jesse M. Furman United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Ashu, 19 Cr. 318 (JMF)

Dear Judge Furman:

We are counsel to Defendant Cyril Ashu and write respectfully to request that the Court extend Mr. Ashu's bail for an additional period of 45 days, until Thursday, October 15, 2020.

Since Mr. Ashu was released on April 2, 2020 with a surrender date of June 1, he has complied with all conditions and has been supervised without incident by the Pre-Trial Services agency in the Northern District of Georgia. Mr. Ashu previously requested and was granted two extensions of bail with the Government's consent. Dkts. 102 and 109. Mr. Ashu has found a job approved by Pre-Trial Services, in accordance with the Court's order. Dkt. 109. Mr. Ashu is presently due to surrender on August 31. *Id.*

Mr. Ashu was released "in light of the dire circumstances presented by COVID-19." Dkt. 90. COVID-19 continues to threaten New York City and its immediate environs, and interstate travel remains hazardous. We respectfully submit that the "compelling reasons" for Mr. Ashu's release have not changed and – on consent of the Government, with whom we have conferred – we request that the deadline for Mr. Ashu's surrender be extended by another 45 days, to October 15, 2020.

Respectfully,

/s/ Marc Greenwald

Marc Greenwald

cc: AUSAs Olga Zverovich and Jarrod Schaeffer (via ECF)

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 129.

SO ORDERED.

August 21, 2020